

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

TROY WRAGG, MICHAEL SCRONIC,  
LEONARD BOGDAN, and  
ELIEZER SOTO-CONCEPCION,  
individually and on behalf of  
all others similarly situated,

*Petitioners,*

v.

DAVID E. ORTIZ, in his capacity as Warden  
of the Federal Correctional Institution, Fort  
Dix, and MICHAEL CARVAJAL, in his  
capacity as Director of the Bureau of Prisons,

*Respondents.*

Case No. 20-cv-5496-RMB

**NOTICE OF MOTION FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65, and upon Petitioners' Memorandum of Law in Support of Petitioners' Motion for Preliminary Injunction and their Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. §2241, Petitioners hereby move this Court to issue a Preliminary Injunction ordering temporary enlargement of custody (or bail pending habeas corpus) of Petitioners and Class Members during the pendency of the petition for a writ of habeas corpus.

Given the exigencies and the threat of irreparable harm outlined in the accompanying Memorandum of Law, Petitioners respectfully request that the Court order Respondents to respond to this Motion expeditiously. Counsel for Petitioners have written to Counsel for Respondents via

electronic mail in an attempt to negotiate a jointly proposed briefing schedule for the Motion.

Counsel for Petitioners will file their proposal with the Court on May 7.<sup>1</sup>

Dated: May 6, 2020

Respectfully submitted:

s/ Tess Borden

Tess Borden (260892018)

Jeanne LoCicero

AMERICAN CIVIL LIBERTIES UNION

OF NEW JERSEY FOUNDATION

570 Broad Street, 11th floor

P.O. Box 32159

Newark, NJ 07102

973-854-1733

[tborden@aclu-nj.org](mailto:tborden@aclu-nj.org)

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<sup>1</sup> Counsel for Petitioners will send courtesy copies, by electronic mail, of this Motion, Memorandum of Law, and accompanying Exhibit, to AUSAs Elizabeth Pascal, John Basiak, John Ruymann, and John Stinson, within one hour of the filing of this Motion.